

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>20-22063</b>
	)	
<b>TIFFANY A. BARNES,</b>	)	<b>Chapter 13</b>
	)	
<b>Debtor.</b>	)	<b>Hon. Judge Donald R. Cassling</b>

**NOTICE OF MOTION**

TO: See attached list

On December 2, 2021, at 9:30 a.m., I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video,** use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and Passcode:** The meeting ID for this hearing is **161 414 7941** and the passcode is **619**. The meeting ID and passcode can also be found on Judge Cassling's webpage on the court's website <https://www.ilnb.uscourts.gov/content/judge-donald-r-cassling>.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movants: Tiffany A. Barnes  
By: Michael R. Colter, II  
David M. Siegel & Assoc., LLC  
790 Chaddick Drive  
Wheeling, IL 60090  
(847) 520-8100 - [davidsiegelbk@gmail.com](mailto:davidsiegelbk@gmail.com)

**CERTIFICATE OF SERVICE**

I, Michael R. Colter, II, certify that I served a copy of this notice and the attached motion on each entity shown on the list below at the address shown and by the method indicated on the list on November 11, 2021, before 5:30 p.m.

*To the following persons or entities who have been served via electronic mail:*

U.S. Bankruptcy Trustee

Thomas H. Hooper, Chapter 13 Trustee

*To the following persons or entities who have been served via U.S. Mail:*

Tiffany A. Barnes

9538 S. Sangamon Street

Chicago, IL 60643

City of Chicago Department of Finance

Chicago Dept. of Law Bankruptcy

121 N. LaSalle St., Suite 400

Chicago, IL 60602

Exeter Finance LLC

c/o AIS Portfolio Services, LP

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118

LVNV Funding, LLC

Resurgent Capital Services

P.O. Box 10587

Greenville, SC 29603-0587

Navient Solutions, LLC.

Dept of Education Loan Services

P.O. Box 9635

Wilkes-Barre, PA 18773-9635

NPRTO Illinois, LLC

256 West Data Drive

Draper, UT 84020

Phoenix Financial Services, LLC

P.O. Box 361450

Indianapolis, IN 46236

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	)	
<b>TIFFANY A. BARNES,</b>	)	<b>Chapter 13</b>
	)	
<b>Debtor.</b>	)	<b>Hon. Judge DONALD R. CASSLING</b>

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Tiffany A. Barnes, by and through her attorney, David M. Siegel & Associates, LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the U.S. District Court for the Northern District of Illinois.
- 2) On December 28, 2020, Tiffany A. Barnes (Debtor) filed for bankruptcy relief under Chapter 13 of Title 11 USC.
- 3) Debtor's plan was confirmed on March 25, 2021, with monthly payments of \$625.00, and general unsecured creditors receiving no less than 10% of their allowed claims.
- 4) Debtor had a medical emergency during July, August, and September resulting in Debtor's current default in plan payments.
- 5) Debtor has returned to work and payroll deductions have begun to post.
- 6) Debtor seeks to modify her plan under § 1329 and defer the current payment default.
- 7) Debtor seeks to modify her plan under § 1329 to increase the plan payment to \$650.00 per month. Deferring the default and increasing the payment to \$650.00 will not cause the plan to run longer than 60 months.
- 8) General unsecured creditors will still receive no less than 10% of allowed claims.

WHEREFORE, the Debtor, Tiffany A. Barnes, prays that this Honorable Court enter an Order Modifying Debtor's Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II

Michael R. Colter, II, A.R.D.C. #6304675  
Attorney for the Debtor